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Counsel to the Debtors and
Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - - x
In re: : Chapter 11
:
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
et al., :
:
Debtors. : Jointly Administered
- - - - - x

**NOTICE OF RULE 30(b)(6) DEPOSITION
OF EXPORT DEVELOPMENT CANADA**

Please take notice that, pursuant to Fed. R. Civ. P.
30(b)(6) and Fed. R. Bankr. P. 7030, counsel for the Debtors
in the above-captioned cases, will take the deposition upon
oral examination of Export Development Canada ("EDC")¹ before

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Debtors' First Request for Admissions, First Set

a person authorized to administer oaths at the place, date, and time indicated below. The deposition will be recorded by stenographic means. EDC is requested to designate the person or persons most knowledgeable to prepare to testify on behalf of EDC concerning the following:

1. The Motion for Allowance of the Late Filed Administrative Expense Claim of Export Development Canada (Docket No. 2960) (the "Motion").

2. The nature of the relationship between EDC and TechCraft at all times prior to the 503(b)(9) Bar Date.

3. EDC's knowledge that the Debtors filed Case No. 08-35653.

4. EDC's knowledge of the 503(b)(9) Bar Date in Case No. 08-35653.

5. Any communications and correspondence between EDC and TechCraft regarding the 503(b)(9) Bar Date Notice.

6. EDC's protocols, procedures, and methodologies for responding to bankruptcy

notifications, bar date notifications, and other legal service of process.

7. All cases, civil, bankruptcy, or other proceedings, in which EDC failed to timely respond to any court-imposed deadlines, bar date notifications, and/or legal papers, or alleged that you failed to receive any documents, notices, and/or pleadings, and the outcome of such instances.

The deposition(s) will commence at 10:00 a.m. (Eastern)
on December 4, 2009 at McGuireWoods LLP, One James Center,
901 East Cary Street, Richmond, Virginia 23219. If
necessary, each deposition will be adjourned until
completed.

The deposition will continue, in duration, in a manner
consistent with Fed. R. Civ. P. 30 (d) and Fed. R. Bankr. P.
7030.

Dated: November 20, 2009
Richmond, Virginia

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